

23

**UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF MICHIGAN
SOUTHERN SECTOR**

Larry Meitzner
Plaintiff
v.

Judge
Hon. Gershwin A. Drain

The City of Sterling Heights, MI
&
Mark Vanderpool
Defendants

Magistrate Judge
Elizabeth A. Stafford

Case No. 2:21-cv-12169

MOTION FOR SANCTIONS

UNDER

Fed. R. Civ. Pro. 11

The Plaintiff, Larry Meitzner, (Meitzner) has been tolerant of Counsel's antics; filing a perjured form for Waiver of Service of Summons, leapfrogging from that perjured form to file a DEFENDANTS' ANSWER which Meitzner feels to be so weak as to be non-existent. The icing on the cake is his latest 40-page diatribe labeled Motion to Dismiss. Case 2:21-cv-12169 -GAD-EAS ECF No. 21, PageID 138 - 178 Filed 02/11/22.

Counselor seems to forget the intervening issues:

His clients failed to respond to the complaint, resulting in a motion for Default Judgement;

A Waiver of Service of Summons cannot be used against a government entity;

1/2

Counselor's filing of form AO 399 should be considered perjury;

The Court will be setting a new precedent by defining "timely." Rule 12(a)(1)(A)(ii).

Court records show Summons was recorded on 11/10/21. This makes the Waiver dated 11/19/21 superfluous, irrelevant.

We can now add Judicial Estoppel. Defense based its ANSWER on a continuing series of "are without sufficient information so as to determine the truth . . ." Counsel has taken a completely different tack with his MOTION TO DISMISS which violates the principle of estoppel.

Meitzner has expended time and money to respond to these frivolities. The only way to prevent future injury is for the Court to issue sanctions against Counselor Petrusak and the law firm of O'Reilly Rancilio P.C. The penalty to the Court should be severe as to send a message. A token award to Meitzner should be included.

MAR. 1, 2022



Larry Meitzner

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2/2

